



February 29, 2024

VIA ECF

The Honorable Dale E. Ho
U.S. District Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. M/Y Amadea, No. 23-cv-9304 (DEH)

Dear Judge Ho:

We represent Claimants in the above-referenced matter. The government's reply memorandum regarding its Motion for Interlocutory Sale is due tomorrow, Friday, March 1, 2024. The government has informed us that it intends to raise new arguments in its reply memorandum and submit a new declaration in support of its reply memorandum regarding an appraised value of the Amadea. Under these circumstances, Claimants are entitled to file a sur-reply to address these new arguments and evidence. *See Stepski v. M/V Norasia Alya*, No. 06-CV-1694 (JSG), 2010 WL 11526765, at *1 (S.D.N.Y. Mar. 3, 2010). The government consents to the Claimants filing of a sur-reply, however the parties disagree as to whether Claimants should file within five days (the government's position) or seven days (the Claimants' position). The government has informed us that it "does not believe a full week is warranted given the limited scope and short length of its reply, together with the time-sensitive nature of the motion for interlocutory sale." Claimants, however, request seven days given that the government will be presenting new arguments in its reply memorandum.

We respectfully request that Your Honor grant our request to file a sur-reply by March 8, 2024, and thank the Court for its consideration of this submission.

Respectfully Submitted,

/s/ Adam C. Ford

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